IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

This document relates to:

Case No. 1:18-op-45459-DAP

THE MUSCOGEE (CREEK) NATION,

PLAINTIFF,

v.

PURDUE PHARMA L.P., et al.,

DEFENDANTS.

MDL No. 2804

Master Docket No.: 1:17-MD-02804-DAP

Hon. Judge Dan A. Polster

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE MOTION TO CORRECT CLERICAL ERROR

Pursuant to Case Management Order One § 6.g, *In re: National Prescription Opiate Litigation*, Case No. 1:17-md-2804 (N.D. Ohio), ECF No. 232 and Local Rule 7.1, Plaintiff in the above-captioned case hereby moves for leave to file a motion ("Proposed Motion"), attached hereto as Exhibit A, for the reasons set forth therein. The Proposed Motion requests that the Court accept a substituted Exhibit L to Plaintiff's Consolidated Opposition to Defendants' Motions to Dismiss the Nation's First Amended Complaint, ECF No. 84 in order to correct a clerical error, whereby an incorrect version of the exhibit was inadvertently attached.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff leave to file the Proposed Motion attached as Exhibit A, and enter the proposed order attached as Exhibit B. Dated: November 6, 2018

OF COUNSEL:
Gregory M. Utter
Joseph M. Callow, Jr.
KEATING MUETHING &
KLEKAMP PLL
One East Fourth Street, Suite 1400
Cincinnati, OH 45202
gmutter@kmklaw.com
jcallow@kmklaw.com

Richard W. Fields FIELDS PLLC 1700 K Street, NW, Suite 810 Washington, DC 20006 fields@fieldslawpllc.com

Lloyd B. Miller
Donald J. Simon
Whitney A. Leonard
SONOSKY CHAMBERS SACHSE
ENDRESON & PERRY, LLP
1425 K Street, NW, Suite 600
Washington, DC 20005
lloyd@sonosky.net
dsimon@sonosky.net
whitney@sonosky.net

William S. Ohlemeyer
Patricia Melville
Tyler Ulrich
Stephen N. Zack
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
wohlemeyer@bsfllp.com
pmelville@bsfllp.com
tulrich@bsfllp.com
szack@bsfllp.com

/s/ Kevin Dellinger

Attorney General Kevin Dellinger, OBA #15612 MUSCOGEE (CREEK) NATION P.O. Box 580 Okmulgee, OK 74447 kdellinger@mcnag.com

/s/ Jenna A. Hudson

Scott D. Gilbert
Richard Shore
Peter Meringolo
Michael B. Rush
Jenna A. Hudson
GILBERT LLP
1100 New York Avenue, NW, Suite 700
Washington, DC 20005
gilberts@gotofirm.com
shorer@gotofirm.com
meringolop@gotofirm.com
rushm@gotofirm.com
hudsonj@gotofirm.com

Attorneys for the Muscogee (Creek) Nation

CERTIFICATE OF SERVICE

I, Jenna A. Hudson, hereby certify that on November 6, 2018 the foregoing document was served via the Court's ECF system to all counsel of record.

> /s/ Jenna A. Hudson Jenna A. Hudson